

FILED

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

2019 FEB 28 PM 3:24

U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHAD A. LITTLE,

Defendant.

INDICTMENT

4812 CR 104

CASE NO. \_\_\_\_\_

Title 21, United States Code,  
Sections 856(a)(1) and (b), 841(a)(1)  
and (b)(1)(C), 841(a)(1) and  
(b)(1)(B)(i) and (vi), Title 18, United  
States Code, Sections 922(g)(1) and  
924(a)(2)

JUDGE OLIVER

COUNT 1

(Maintaining a Drug-Involved Premises, 21 U.S.C. §§ 856(a)(1) and (b))

The Grand Jury charges:

1. From in or about October, 2018 through November 7, 2018, in the Northern District of Ohio, Eastern Division, Defendant CHAD A. LITTLE knowingly and intentionally maintained a place on E. Philadelphia Street in Youngstown, Ohio, for the purpose of distributing and possessing with intent to distribute cocaine base (crack), a Schedule II controlled substance, heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 856(a)(1) and (b).

COUNT 2

(Possession with the Intent to Distribute Cocaine Base (Crack), 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

2. On or about November 7, 2018, in the Northern District of Ohio, Eastern Division, Defendant CHAD A. LITTLE knowingly and intentionally possessed with the intent to

distribute a mixture and substance containing a detectable amount of cocaine base (crack), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 3

(Possession with the Intent to Distribute Heroin and Fentanyl, 21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(i) and (vi))

The Grand Jury further charges:

3. On or about November 7, 2018, in the Northern District of Ohio, Eastern Division, Defendant CHAD A. LITTLE knowingly and intentionally possessed with the intent to distribute more than 100 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(i) and (vi).

COUNT 4

(Possession of Firearm in Furtherance of a Drug Trafficking Crime,  
18 U.S.C. § 924(c)(1)(A)(i))

The Grand Jury further charges:

4. On or about November 7, 2018, in the Northern District of Ohio, Eastern Division, Defendant CHAD A. LITTLE, in furtherance of drug trafficking crimes for which he may be prosecuted in a court of the United States, those are: Maintaining a Drug Involved Premises, in violation of Title 18, United States Code, Sections 856(a)(1) and (b), as charged in Count 1 herein, Possession with Intent to Distribute Cocaine Base (Crack), in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), as charged in Count 2 herein, and Possession with Intent to Distribute Heroin and Fentanyl, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(i) and (vi), as charged in Count 3 herein, possessed a

firearm, that is, a Taurus, .38 Special revolver, serial number BP31771, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 5

(Felon in Possession of a Firearm and Ammunition, 18 U.S.C. §§ 922(g)(1) and 924(a)(2))

The Grand Jury further charges:

5. On or about November 7, 2018, in the Northern District of Ohio, Eastern Division, Defendant CHAD A. LITTLE, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, that is: Possession of Cocaine, in the Mahoning County Court of Common Pleas, Case Number 15CR1226, on or about March 3, 2016, did knowingly possess in and affecting interstate and foreign commerce a firearm, to-wit: a Taurus, .38 Special revolver, serial number BP31771, and various ammunition, said firearm and ammunition having been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

FORFEITURE

The Grand Jury further charges:

6. For the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), the allegations of Counts 1 through 5 inclusive, are incorporated herein by reference. As a result of the foregoing offenses, Defendant CHAD A. LITTLE shall forfeit to the United States any and all property constituting, or derived from, any proceeds he obtained, directly or indirectly, as the result of such violations; any and all of his property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations;

and, any and all property (including firearms and ammunition) involved in or used in the commission of such violations.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.